

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)
)
PYRAMID COMMUNICATIONS, INC.)
) RM-11635
Petition for Rulemaking to Modify)
Sections 90.20(d)(24) and 90.65 of the)
Commission's Rules to Facilitate the Use)
of Vehicular Repeater Units)

COMMENTS OF APCO

The Association of Public-Safety Communications Officials-International, Inc. (“APCO”) hereby submits the following comments in response to the Commission’s Public Notice, DA 11-1717 (October 14, 2011), concerning the above-captioned petition for rulemaking submitted by Pyramid Communications, Inc. (“Pyramid”) regarding spectrum for Vehicular Repeater Service (“VRS”) units.

Founded in 1935, APCO is the nation’s oldest and largest public safety communications organization. Most APCO members are state or local government employees who manage and operate communications systems for police, fire, emergency medical, forestry conservation, highway maintenance, disaster relief, and other public safety agencies. APCO is the largest FCC-certified frequency coordinator for Part 90, Public Safety Pool channels, and appears regularly before the Commission on a wide range of public safety communications issues.

As discussed in the Pyramid petition, there is a clear and growing need for VRS units in many aspects of public safety communications. VRS allows a fire truck, police cruiser or other public safety vehicle to serve as a “repeater” to permit low-power portable radios to be used by firefighters inside of buildings or by police officers when away from their cars. Unfortunately,

frequencies for VRS are scarce, especially because of the requirement to maintain a specified frequency separation between the VRS unit and the vehicle's mobile radio. Therefore, while APCO is not prepared to take a position on all of Pyramid's specific recommendations at this time, we strongly support the initiation of a rulemaking proceeding to explore ways to improve VRS capability.

One of Pyramid's recommendations is to modify the rules to permit VRS use of certain 173 MHz frequencies. APCO agrees that the six "core" frequencies identified¹ should be considered for Public Safety VRS operations as there is sufficient separation between these frequencies to permit voice operations and LMCC frequency coordination standards will minimize the potential for interference. However, the remaining four "edge" frequencies identified by Pyramid² should not be considered for VRS use, as the lower two and upper two frequencies are only 6.25 kHz apart. This results in insufficient separation between the two frequencies for voice use, and makes coordination difficult.

APCO would also support lifting or modifying Section 90.20(d)(33) to permit use of voice communications, including narrowband analog (11K2F3E) and Project 25 digital (8K10F1E) emissions on the specified channels.

Finally, APCO recommends that the Commission broaden the scope of the requested rulemaking to identify additional UHF, 700 MHz, and 800 MHz spectrum that could be used for public safety VRS operations. The need for public safety VRS is not limited to VHF.

¹ 173.2375, 173.2625, 173.2875, 173.3125, 173.3375 and 173.3625 MHz.

² 173.20375, 173.210, 173.390 and 173.39625 MHz.

CONCLUSION

Therefore, for the reasons set forth above, APCO supports the initiation of a rulemaking proceeding to expand frequency options for public safety VRS operations.

Respectfully submitted,

/s/

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